## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

) Case No. 16-cv-1054 (WMW/DTS)
) Jury Trial Demanded
) )
) ) )

## **PLAINTIFF'S MOTION TO COMPEL**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rules 7.1 and 37.1, Plaintiff Fair Isaac Corporation ("FICO") moves to compel Defendant Federal Insurance Company ("Federal") to comply fully with FICO's written discovery requests. This Motion is supported by an accompanying Memorandum of Law to be filed in compliance with Local Rule 7.1, the Declaration of Michael Erbele and Exhibits attached to the Erbele Declaration, the papers and records on file herein, and on such information and evidence as may be presented at any hearing on this Motion.

Dated: January 29, 2018 MERCHANT & GOULD, P.C.

## /s/ Heather Kliebenstein

Allen Hinderaker, MN Bar # 45787 Heather Kliebenstein, MN Bar # 337419 Michael A. Erbele, MN Bar # 393635 MERCHANT & GOULD P.C. 3200 IDS Center 80 South Eighth Street Minneapolis, MN 55402-2215 Tel: (612) 332-5300

Fax: (612) 332-9081 ahinderaker@merchantgould.com hkliebenstein@merchantgould.com merbele@merchantgould.com

John T. Winemiller, *pro hac vice* MERCHANT & GOULD P.C. 9719 Cogdill Road, Suite 101 Knoxville, TN 37932-3322

Tel: (865) 380-5960 Fax: (865) 380-5999

jwinemiller@merchantgould.com

Attorneys for Plaintiff FICO